



Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

CITY OF HAMMOND

RONALD L. NOVAK
Director

June 1, 2006

Mr. Michael Milaszewski
Plant Manager
Rhodia, Inc.
2000 Michigan Street
Hammond, IN 46320

RE: Response to Review Request No. 089-22904-00242

Dear Mr. Milaszewski:

On March 27, 2006, the Hammond Department of Environmental Management (HDEM) received a Request for Review from Rhodia, Inc., located at 2000 Michigan Street, Hammond, Indiana 46320. The request stated that Rhodia plans to replace the catalyst in the fourth converter bed with cesium-promoted vanadium catalyst and to perform other minor equipment changes aimed at minimizing start-up emissions. Rhodia further states in the request that the new catalyst and other changes are being made for the express purpose of lowering sulfur dioxide emissions and will have no effect on production capacity of Sulfuric Acid Regeneration Unit 4. Rhodia, Inc. was issued a Part 70 Operating Permit (T089-7258-00242) on February 5, 2001. An Administrative Amendment (T089-18946-00242) to the permit was issued on May 18, 2004.

The source may be exempt from the registration and permitting requirements of 326 IAC 2, if the increase in the potential to emit due to the proposed modification is less than the following emissions threshold levels as listed in 326 IAC 2-1.1-3(e)(1):

1. Five (5) tons per year of either particulate matter (PM) or particulate matter with an aerodynamic diameter less than ten (10) micrometers (PM₁₀).
2. Ten (10) tons per year of sulfur dioxide (SO₂).
3. Ten (10) tons per year of nitrogen oxides (NO_x).
4. Ten (10) tons per year of volatile organic compounds (VOC) for sources or modifications that are not described by clause 5 below.
5. Five (5) tons per year of volatile organic compounds (VOC) for sources or modifications that require the use of air pollution control equipment to comply with the applicable provisions of 326 IAC 8.
6. Twenty-five (25) tons per year of carbon monoxide (CO).
7. Two-tenths (0.2) ton per year of lead (Pb).
8. One (1) ton per year of a single hazardous air pollutant (HAP) or two and one-half tons per year of any combination of hazardous air pollutants (HAPs) listed pursuant to Section 112(b) of the Clean Air Act (CAA).
9. Five (5) tons per year of the following regulated air pollutants:
 - a. Hydrogen sulfide (H₂S)
 - b. Total reduced sulfur (TRS)
 - c. Reduced sulfur compounds
 - d. Fluorides

If there is a reasonable possibility that these changes to the source would constitute a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emission unit, other than projects at a Clean Unit (or at a source with Plant-wide Applicability Limitation (PAL)), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), then the source will be required to keep records and report in accordance with Source obligation in 326 IAC 2-2-8 and Applicability in 326 IAC 2-3-2.

If the source requires that a definitive decision be made by the Hammond Department of Environmental Management (HDEM) and a permit be issued, the source must submit a permit application to HDEM. Based on the information provided in that application, HDEM can then make a final determination on the appropriate permit level for this source.

Permit application forms and related information can be obtained from the City of Hammond’s website at <http://www.gohammond.com/web/index.php?id=302,0,0,1,0,0>.

Sincerely,

Thomas J. Nyhan,
Engineer
HDEM

Cc: Matt Stuckey- IDEM
Mindy Hahn- IDEM
Nathan Frank- USEPA